

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT COLUMBUS**

<b>JANE DOE,</b>	)	Case No. 2:13 CV0486
	)	
Plaintiff,	)	Judge Gregory L. Frost
	)	Magistrate Judge Mark R Abel
vs.	)	
	)	
<b>KEVIN C. BOLLAERT, et. al.,</b>	)	
	)	
Defendants.	)	
	)	

**JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE AND ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to this action, themselves or through their respective attorneys, that pursuant to Rules 41(a)(1)(ii) and 41(a)(2) of the Federal Rules of Civil Procedure, any and all claim claims asserted herein in this action by Plaintiff Jane Doe (“Plaintiff”) against Defendants Amy Chanson and Roy Chanson (the “Chansons”) (the Plaintiff and Chansons collective referred to herein as the “Parties”), be and are hereby dismissed with prejudice, each party to bear any remaining costs and attorneys’ fees other than the amounts already paid pursuant to the terms of a Confidential Settlement Agreement (“Agreement”) entered into by and between the Parties.

The Parties stipulate to dismiss this action with prejudice upon the Court’s approval of this stipulation and order expressly incorporating herein specific terms of the executed Agreement as follows:

1. No Admission of Fault or Liability: Amy Chanson and Roy Chanson deny any and all involvement whatsoever of any kind, direct or indirect, in the websites (<isanyoneup.net>, <yougotposted.com>, and <ugotposted.com>) that are the subject of this action, and no admission of liability should be implied.
2. Removal of Internet Content: Pursuant to the Agreement and this Order, the Chansons may, in their sole discretion, seek to remove and/or de-index any and all content or material mentioning or referencing them in the context of this lawsuit, including copies of pleadings, motions, and court orders, from the Internet, and/or major search engines including Microsoft Bing, Yahoo!, and Google. However, this order does not compel any third party to take any action. Websites currently displaying this content that the Chansons may request removal from, include the following URL(s):
  - a. <http://www.scribd.com/doc/139317495/Roy-and-Amy-Chanson-Motion-Set-Aside-Judgment-in-Revenge-Porn-Site-YouGotPosted-Case>
  - b. <http://www.crimevoice.com/revenge-to-be-dealt-against-porn-site-owner/>
  - c. [http://bv.1110.cds.contentcolo.net/uploads/files/Doc\\_028\\_-\\_Default\\_Judgement-GRANTED.pdf](http://bv.1110.cds.contentcolo.net/uploads/files/Doc_028_-_Default_Judgement-GRANTED.pdf)
  - d. <http://adamsteinbaugh.com/2013/04/05/revenge-porn-yougotposted-held-in-contempt-lose-case-to-bullyville/>
  - e. <https://www.rfcexpress.com/lawsuits/other-statutory-actions/ohio-southern-district-court/513514/jane-doe-v-kevin-c-bollaert-eric-s-chanson-roy-e-chanson-amy-l-chanson-blue-mist-media-llc-and-john-roe/summary/>

- f. <http://www.pastebay.net/1062405>
- g. <http://www.williamgryan.mobi/?p=654>
- h. <http://www.plainsite.org/dockets/tf0avflh/ohio-southern-district-court/doe-v-bollaert-et-al/>
- i. <http://sandiegofreepress.org/2013/12/the-case-against-revengeporn-bad-guy-kevin-bollaert/#.U4ZQgPldXaU>
- j. <http://heavy.com/news/2013/12/kevin-bollaert-ugotposted-owner/>
- k. <http://archive.today/Ai6sJ>
- l. <http://revengepornwar.blogspot.de/2013/06/u-got-posted-sued-again-for-alleged.html>
- m. <http://www.internetremoval.com/general-news/yougotposted-com-site-owner-charged-with-31-felony-counts/>
- n. <http://anonnews.org/forum/post/13681>
- o. <http://www.breitbart.com/system/wire/upiUPI-20130731-075449-7881>
- p. <http://revengeporn.blogspot.com/2013/09/dangerous-online-stalkers-stealing.html>

This stipulation is signed by the Parties or counsel for the Parties. This Court will retain jurisdiction for the purpose of enforcing the Agreement.

Dated: June 14, 2014

/s/ H. Louis Sirkin

H. Louis Sirkin, Ohio Bar No. 0024573  
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(513) 721-4450

Dated: June 14, 2014

/s/ Marc J. Randazza

Marc J. Randazza  
Randazza Legal Group  
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(702) 420-2001

Dated: June 5, 2014

  
\_\_\_\_\_  
Roy E. Chanson

Dated: June 5, 2014

  
\_\_\_\_\_  
Amy L. Chanson

APPROVED AND SO ORDERED.

DATED: June 17, 2014

/s/ Gregory L. Frost

Gregory L. Frost  
United States District Judge